EXHIBIT 18

BY FEDERAL EXPRESS
ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

September 2, 2014

Department of Defense
Office of Security Review
2A534, Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and advance copy of this letter.

The original of this letter, five (5) CD-ROMs containing the electronic files, and five (5) unbound copies of the rendered images for review, are being sent contemporaneously herewith by Federal Express.

The electronic files are Computer Assisted Drafting ("CAD") files that can be used with a 3D printer or a computer numerical control machine to produce the hardware depicted in the rendered images of the electronic files.

These documents were created by John Sullivan, who is an employee of Defense Distributed. Defense Distributed is a Texas corporation. It is registered with the Department of State as a Defense Article Manufacturer under registration number M-34702.

The information contained in the documents is NOT company proprietary, was NOT developed under any U.S. Government contract, and is NOT subject to any government contract restrictions on dissemination.

These documents are NOT in the public domain. However, public release of the information contained in documents will not harm national security because design

Scanned by CamScanner

specifications containing similar information and similar CAD files for AR-15 lower receivers are already publicly available online.

.STP and/or .STL files for AR-15 lower receivers are already publicly available for download at a variety of web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

Other CAD file formats for lower receivers to the AR-15 are also publicly available online at web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
www.cncguns.com/downloads.html

In addition, detailed design specifications for AR-15 lower receivers are also available online from a variety of sources, to include the following:

www.homegunsmith.com/archive/T6215.html
www.ar15.com/archive/topic.html?b=3&f=4&t=619878
www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

I expect to publish the documents on the Defense Distributed website on or about October 1, 2014. OSR review of the documents is therefore needed before September 30, 2014, but review after this time is acceptable in lieu of return without action.

Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

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Att./Encl.:

.IPT Electronic File for AR-15 Lower Receiver (CD-ROM)
.STEP Electronic File for AR-15 Lower Receiver (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (CD-ROM)
5 Rendered Images of .STEP and .STL files

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EXHIBIT 19

BY FEDERAL EXPRESS
ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

October 9, 2014

Department of Defense
Office of Security Review
2A534, Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents (C)

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and this advance copy letter.

The original of this letter, five (5) CD-ROMs containing the electronic files, and five (5) unbound copies of the rendered images for review, are being sent contemporaneously herewith by Federal Express.

The electronic files are Computer Assisted Drafting ("CAD") files that can be used with a 3D printer or a computer numerical control machine to produce the hardware depicted in the rendered images of the electronic files.

These documents were created by John Sullivan, who is an employee of Defense Distributed. Defense Distributed is a Texas corporation. It is registered with the Department of State as a Defense Article Manufacturer under registration number M-34702.

The information contained in the documents is NOT company proprietary, was NOT developed under any U.S. Government contract, and is NOT subject to any government contract restrictions on dissemination.

These documents are NOT in the public domain. However, public release of the information contained in documents will not harm national security because design

Scanned by CamScanner

specifications containing similar information and similar CAD files for AR-15 lower receivers are already publicly available online.

.STP and/or .STL files for AR-15 lower receivers are already publicly available for download at a variety of web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

Other CAD file formats for lower receivers to the AR-15 are also publicly available online at web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
www.cncguns.com/downloads.html

In addition, detailed design specifications for AR-15 lower receivers are also available online from a variety of sources, to include the following:

www.homegunsmith.com/archive/T6215.html
www.ar15.com/archive/topic.html?b=3&f=4&t=619878
www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

I expect to publish the documents on the Defense Distributed website on or about October 1, 2014. OSR review of the documents is therefore needed before November 3, 2014, but review after this time is acceptable in lieu of return without action.

Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

Scanned by CamScanner

Att./Encl.:

.STP Electronic File for AR-15 Lower Receiver (Collapsible Stock) (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (Collapsible Stock) (CD-ROM)
5 Rendered Images of .STP and .STL files

Scanned by CamScanner

EXHIBIT 20

BY FEDERAL EXPRESS
ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

October 9, 2014

Defense Office of Prepublication and Security Review
Room 2A534
1155 Defense Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents (M)

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and this advance copy letter.

The original of this letter, five (5) CD-ROMs containing the electronic files, and five (5) unbound copies of the rendered images for review, are being sent contemporaneously herewith by Federal Express.

The electronic files are Computer Assisted Drafting ("CAD") files that can be used with a 3D printer or a computer numerical control machine to produce the hardware depicted in the rendered images of the electronic files.

These documents were created by John Sullivan, who is an employee of Defense Distributed. Defense Distributed is a Texas corporation. It is registered with the Department of State as a Defense Article Manufacturer under registration number
M-34702.

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These documents are NOT in the public domain. However, public release of the information contained in documents will not harm national security because design

specifications containing similar information and similar CAD files for AR-15 lower receivers are already publicly available online.

.STP and/or .STL files for AR-15 lower receivers are already publicly available for download at a variety of web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

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www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

I expect to publish the documents on the Defense Distributed website on or about October 1, 2014. OSR review of the documents is therefore needed before November 3, 2014, but review after this time is acceptable in lieu of return without action.

Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

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Att./Encl.:

.STP Electronic File for AR-15 Lower Receiver (Metal) (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (Metal) (CD-ROM)
5 Rendered Images of .STP and .STL files

EXHIBIT 21

BY FEDERAL EXPRESS
ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

October 23, 2014

Defense Office of Prepublication and Security Review
Room 2A534
1155 Defense Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents (C)

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and this advance copy letter.

The original of this letter, five (5) CD-ROMs containing the electronic files, and five (5) unbound copies of the rendered images for review, are being sent contemporaneously herewith by Federal Express.

The electronic files are Computer Assisted Drafting ("CAD") files that can be used with a 3D printer or a computer numerical control machine to produce the hardware depicted in the rendered images of the electronic files.

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http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

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www.cncguns.com/downloads.html

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www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

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Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

Scanned by CamScanner

Att./Encl.:

.STP Electronic File for AR-15 Lower Receiver (Collapsible Stock) (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (Collapsible Stock) (CD-ROM)
5 Rendered Images of .STP and .STL files

EXHIBIT 22

From: **King, Walter J CIV WHS ESD (US)** walter.j.king.civ@mail.mil
Subject: RE: Meeting re Open Defense Distributed Requests
Date: December 31, 2014 at 2:59 PM
To: matthew@goldsteinpllc.com

KW

Matt,

You requested DOPSR respond NLT the end of the year on these issues in your 2 Dec e-mail.

I've attached three letters, the first clarifying case 15-S-2473 (only the printed or rendered images not the actual CAD files are cleared for public release), a copy of the original approval letter for that case, and the outcomes of 15-S-0358 and 15-S-0514 (again only the printed or rendered images are cleared for public release). Please see the letters for additional explanation.

I've been short staffed this holiday period and regret not sending them to you previously. Hard copies will also be sent regular mail.

R,

Wally King, P.E.
Chief, Technology Branch
Defense Office of Prepublication and Security Review
Department of Defense
Room 2A534, The Pentagon
Direct line: 703-614-4908
General line: 703-614-5001
http://www.dtic.mil/whs/esd/osr/

-----Original Message-----
From: matthew@goldsteinpllc.com [mailto:matthew@goldsteinpllc.com]
Sent: Wednesday, December 10, 2014 7:20 AM
To: King, Walter J CIV WHS ESD (US)
Subject: RE: Meeting re Open Defense Distributed Requests

Wally,

Files for the Collapsible stock receiver is attached.

-Matt

Matthew A. Goldstein | Counsel
1012 14th Street, NW, Suite 620
Washington, DC 20005
C: 1.202.550.0040
www.GoldsteinPLLC.com

This message may contain information that is privileged and/or confidential. As such, it is solely intended for disclosure to the recipient named above. Access by anyone other than the intended recipient is unauthorized. If you have received this electronic transmission in error, please immediately reply that you have received the message and delete the message. Note that if you are not the intended recipient, any copying, disclosure, distribution, or other unauthorized use of the information contained in this message is prohibited and may be unlawful. Thank you.

--------- Original Message ---------
Subject: RE: Meeting re Open Defense Distributed Requests
From: "King, Walter J CIV WHS ESD (US)" <walter.j.king.civ@mail.mil>
Date: 12/9/14 1:30 pm
To: "Matthew Goldstein" <matthew@goldsteinpllc.com>

Matt,

While you forwarded the 9 Oct letter a couple of times, I don't think the attachments made it to us. I can't find any evidence it was actually delivered to our SECREV account. Perhaps it was sent on the day we exceeded our storage allocation?

Unlike the 23 Oct letter which had e-mail attachments when sent to our SECREV office e-mail account--so we could process that request even though the FedEx it referenced was returned to your client and not delivered.

R,

Wally

-----Original Message-----
From: Matthew Goldstein [mailto:matthew@goldsteinpllc.com]
Sent: Wednesday, December 03, 2014 11:33 AM
To: King, Walter J CIV WHS ESD (US)
Cc: Kluzik, Donald E CIV WHS ESD (US)
Subject: Re: Meeting re Open Defense Distributed Requests
Importance: High

Thanks Wally.

The October 9 and 23 requests are for electronic files and images that pertain to two different AR-15 lower receiver variants (one is “metal" and the other is for "collapsible stock").

Were both requests consolidated and assigned re same case no (i.e., 15-S-0358)?

-Matt

Matthew A. Goldstein | Counsel
1012 14th Street, NW, Suite 620
Washington, DC 20005
C: +1.202.550.0040

> On Dec 3, 2014, at 9:37 AM, King, Walter J CIV WHS ESD (US) <walter.j.king.civ@mail.mil> wrote:
>
> Mr. Goldstein,
>
> This request was assigned case number 15-S-0358 (Mr. Don Kluzik is my AO), this case was assigned for review outside our organization, and is due back 5 Dec 2014. I know of no delays, but we don't consider the case late until the due date has passed.
>
> I'll contact the reviewing office next Monday if we don't get their response this week.
>
> While Tina assisted both of us in tracking down delivery difficulties she doesn't normally work security review cases. She is our dedicated security manager. It's ok to exclude her in future correspondence. You're welcome to contact myself or Mr. Kluzik for future updates.
>
> R,
>
> Wally
>
>
>
> -----Original Message-----
> From: Matthew Goldstein [mailto:matthew@goldsteinpllc.com]
> Sent: Tuesday, December 02, 2014 2:14 PM
> To: King, Walter J CIV WHS ESD (US); Riley, Tina L CIV WHS ESD (US)
> Subject: Re: Meeting re Open Defense Distributed Requests
>
> Hit send too soon - requests are attached to this email.
>
> Thanks.
>
> -Matt
>
>
>
>> On Dec 2, 2014, at 2:12 PM, Matthew Goldstein <matthew@goldsteinpllc.com> wrote:
>>
>> Wally and Tina,
>>
>> Just checking in on status of the attached October Defense Distributed requests for OSR review/clearance.
>>
>> We’d like to get responses for the company by the end of the year. I’d like to visit with you in-person to informally discuss and perhaps answer any questions you may have if there’s something in particular holding up the reviews.
>>
>> Are you available to meet Monday 12/8 at 11:00 am?
>>
>> Thanks.
>>
>> -Matt
>>
>>
>> Matthew A. Goldstein | Counsel
>> 1012 14th Street, NW, Suite 620
>> Washington, DC 20005

>> C: +1.202.550.0040
>> www.GoldsteinPLLC.com
>>
>> This message may contain information that is privileged and/or confidential. As such, it is solely intended for disclosure to the recipient named above. Access by anyone other than the intended recipient is unauthorized. If you have received this electronic transmission in error, please immediately reply that you have received the message and delete the message. Note that if you are not the intended recipient, any copying, disclosure, distribution, or other unauthorized use of the information contained in this message is prohibited and may be unlawful. Thank you.
>>
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>>
>
>

14-S-2473 (clarification)
14-S-2473 …d 0514.pdf

DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF PREPUBLICATION AND SECURITY REVIEW
1155 DEFENSE PENTAGON
WASHINGTON,DC 20301-1155

December 22, 2014
Ref: 14-S-2473

Mr. Cody R. Wilson
Defense Distributed
1101 West 34th Street, #340
Austin, TX 78705

Dear Mr. Wilson:

This is a clarification to the enclosed September 25, 2014, correspondence providing public release approval of the indicated documents titled:

- "AR-15 Lower Receiver"

The Defense Office of Prepublication and Security Review (DOPSR) desires to clarify the previous approval for public release was in compliance with the International Traffic in Arms Regulations (ITAR) 125.4(b)(13) including ITAR 125.4(a) which states this exemption "are also not applicable for purposes of establishing offshore procurement arrangements *or producing defense articles offshore…* "

In other words, only the **rendered images** previously requested for review (hard copy or electronic) included within the subject request are **APPROVED** for public release as previously stated in our 25 September letter, *however, to clarify,* public release approval of **the actual electronic CAD files** your request letter states "can be used with a 3D printer or a computer numerical control machine to *produce* the hardware depicted in the rendered images of the electronic files" cannot be approved under ITAR 125.4(b)(13), DOPSR's sole ITAR mention, and **are therefore beyond the purview of DOPSR.**

DOPSR recommends you contact the Department of State, Bureau of Political Military Affairs, Office of Defense Trade Controls Compliance regarding public release of any electronic CAD files that can assist in *producing* defense articles controlled under the ITAR.

Please direct any questions regarding this case to Mr. Donald Kluzik at 703-614-4931, email: donald.e.kluzik.civ@mail.mil.

Sincerely,

for

M. M. Langerman
Chief

Enclosures:
As stated

September 25, 2014
Ref: 14-S-2473

Mr. Cody R. Wilson
Defense Distributed
1101 West 34th Street, #340
Austin, TX 78705

Dear Mr. Wilson:

This is in response to the enclosed September 2, 2014, correspondence requesting public release approval of the enclosed documents titled:

- "AR-15 Lower Receiver"

The documents are **APPROVED** for public release. However, this approval does not include any photograph, picture, exhibit, caption, or other supplemental material not specifically approved by this office. Our concurrence for release does not imply DoD endorsement or factual accuracy of the material.

Please direct any questions regarding this case to Mr. Donald Kluzik at 703-614-4931, email: donald.e.kluzik.civ@mail.mil.

Sincerely,

M. M. Langerman
Chief

Enclosures:
As stated

Prepared by: dekluzik:9/25/14:DOPSR:703-614-4931:gr DK pk____

DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF PREPUBLICATION AND SECURITY REVIEW
1155 DEFENSE PENTAGON
WASHINGTON,DC 20301-1155

December 22, 2014
Ref: 15-S-0358
15-S-0514

Mr. Cody R. Wilson
Defense Distributed
1101 West 34th Street, #340
Austin, TX 78705

Dear Mr. Wilson:

This is in response to the letters requesting public release approval of the indicated documents titled:

- "AR-15 Lower Receiver (C)"
- "AR-15 Lower Receiver (M)"

The Defense Office of Prepublication and Security Review (DOPSR) must stay consistent with previous approvals for public release and in compliance with the International Traffic in Arms Regulations (ITAR) 125.4(b)(13) including ITAR 125.4(a) which states this exemption "are also not applicable for purposes of establishing offshore procurement arrangements *or producing defense articles offshore…*"

Therefore, only the **rendered images** requested for review (hard copy or electronic) included within the subject request are **APPROVED** for public release. Public release approval of **the actual electronic CAD files** your request letter states "can be used with a 3D printer or a computer numerical control machine to *produce* the hardware depicted in the rendered images of the electronic files" cannot be approved under ITAR 125.4(b)(13), DOPSR's sole ITAR mention, and **are therefore beyond the purview of DOPSR.**

DOPSR recommends you contact the Department of State, Bureau of Political Military Affairs, Office of Defense Trade Controls Compliance regarding public release of any electronic CAD files that can assist in *producing* defense articles controlled under the ITAR.

Please direct any questions regarding this case to Mr. Donald Kluzik at 703-614-4931, email: donald.e.kluzik.civ@mail.mil.

Sincerely,

for Walt

M. M. Langerman
Chief

Enclosures:
As stated

EXHIBIT 23

MATTHEW A. GOLDSTEIN, PLLC
INTERNATIONAL TRADE
1012 14TH STREET, NW, SUITE 620
WASHINGTON, D.C. 20005

BY COURIER / FEDERAL EXPRESS
Advanced Copy by Email to DDTCResponseTeam@state.gov

January 5, 2015

Ed Peartree, Director
Office of Defense Trade Controls Policy
U.S. Department of State
PM/DDTC, SA-1, 12th Floor
2401 E Street, NW
Washington, D.C. 20037

SUBJECT: Advisory Opinion Request How to Obtain Prepublication Approval of CAD Files from DDTC Compliance and/or Other Agencies/DDTC Divisions
Defense Distributed, Inc., PM/DDTC Code M-34702

Dear Mr. Peartree:

Pursuant to Section 126.9 and 129.10 of the International Traffic in Arms Regulations ("ITAR") (22 C.F.R. Sections 120-130), Defense Distributed requests an advisory opinion from the Directorate of Defense Trade Controls ("DDTC") on how to obtain prepublication approval from the Office of Defense Trade Controls Compliance ("DDTC Compliance") to transmit privately generated unclassified Computer Assisted Drawing ("CAD") files into the Internet and other public forums.

The request also seeks DDTC advisement on what kinds of software, CAD, and other electronic files are reviewable by the Department of Defense Department Office of Prepublication and Security Review ("DOPSR") for public release.

A copy of recent letters from DOPSR recommending that Defense Distributed pursue prepublication approval with DDTC Compliance for public postings of CAD files is provided with this request at Attachment 1.

A letter from Defense Distributed authorizing my law firm to file this request is enclosed at Attachment 2. Please direct any questions and all correspondence related to this request to my office. Communications to me at matthew@goldsteinpllc.com are preferred.

I. BACKGROUND

Defense Distributed is a Texas corporation, registered with the Department of State as a defense article manufacturer under PM/DDTC Code M-34702. The company has developed technical information that can be used to produce, manufacture, and assemble various parts components, accessories, and attachments to firearms that may be controlled under the ITAR.

Following notification from DDTC in May 8, 2013, that the agency requires U.S. Government prior approval before publications of technical information into the public forums (Attachment 3), Defense Distributed has submitted requests for U.S. Government clearance of technical data on Defense Distributed projects to DOPSR.[1]

On September 2, 2014, Defense Distributed sent DOPSR a request for prepublication approval for public release of certain CAD files. DOPSR assigned the request case no. 14-S-2473.

On October 9, 2014, Defense Distributed sent DOPSR two additional requests for prepublication approval for public release of certain CAD files. DOPSR assigned the requests case nos. 15-S-0358 and 15-S-0514.

Copies of the letters sent with Defense Distributed requests to DOPSR are provided at Attachment 4.

On December 31, 2014, DOPSR sent Plaintiff two letters (Attachment 1), postdated December 22, 2014, responding to the Defense Distributed CAD file release requests. The DOPSR letters state that DOPSR will not review the CAD files because the files can be used to "produce" defense articles and can be used in "offshore procurement." In the letters, DOPSR further states:

> DOPSR recommends you contact the Department of State, Bureau of Political Military Affairs, Office of Defense Trade Controls Compliance regarding public release of any electronic CAD files that can assist in *producing* defense articles controlled under the ITAR.

II. SPECIFIC REQUEST FOR GUIDANCE

Defense Distributed requests DDTC guidance on the following specific questions:

1. What is the specific process for obtaining prepublication approval from DDTC Compliance to transmit privately generated unclassified CAD files, and other files into the Internet and other public forums?

2. What kinds of software, CAD, and other electronic files are reviewable by DOPSR for public release?

3. What kinds of software, CAD, and other electronic files are reviewable by DDTC Compliance for public release?

---

[1] In complying with current DDTC-imposed restrictions on publication of technical information into the public domain, Defense Distributed does not intent to, nor should it be considered to, waive any defense, claim or right under law.

4. What kinds of software, CAD, and other electronic files are reviewable by other DDTC Divisions for public release?

III. REQUEST FOR EXPEDITED CONSIDERATION

Defense Distributed understands that DDTC normally responds to advisory opinion requests in thirty (30) days. However, time is of the essence when speech restrained by a government agency. Accordingly, please advise if DDTC will require more than thirty (30) days to answer this request so that the Defense Distributed can plan accordingly.

Thank you for your prompt attention to this matter and please contact me at 202-550-0040 or at matthew@goldsteinpllc.com if any additional information is needed.

Yours truly,

Matthew A. Goldstein
Legal Counsel

ENCLOSURES:

Original and Seven (7) Copies of this Request

Attachment 1	Department of Defense December 22, 2015 Letter
Attachment 2	Letter Authorizing Counsel to File Advisory Opinion Request
Attachment 3	May 8, 2013 DDTC Letter to Defense Distributed
Attachment 4	Defense Distributed Letters Accompanying Subject DOPSR Requests

ATTACHMENT 1

DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF PREPUBLICATION AND SECURITY REVIEW
1155 DEFENSE PENTAGON
WASHINGTON,DC 20301-1155

December 22, 2014
Ref: 14-S-2473

Mr. Cody R. Wilson
Defense Distributed
1101 West 34th Street, #340
Austin, TX 78705

Dear Mr. Wilson:

This is a clarification to the enclosed September 25, 2014, correspondence providing public release approval of the indicated documents titled:

- "AR-15 Lower Receiver"

The Defense Office of Prepublication and Security Review (DOPSR) desires to clarify the previous approval for public release was in compliance with the International Traffic in Arms Regulations (ITAR) 125.4(b)(13) including ITAR 125.4(a) which states this exemption "are also not applicable for purposes of establishing offshore procurement arrangements *or producing defense articles offshore…* "

In other words, only the **rendered images** previously requested for review (hard copy or electronic) included within the subject request are **APPROVED** for public release as previously stated in our 25 September letter, *however, to clarify,* public release approval of **the actual electronic CAD files** your request letter states "can be used with a 3D printer or a computer numerical control machine to *produce* the hardware depicted in the rendered images of the electronic files" cannot be approved under ITAR 125.4(b)(13), DOPSR's sole ITAR mention, and **are therefore beyond the purview of DOPSR.**

DOPSR recommends you contact the Department of State, Bureau of Political Military Affairs, Office of Defense Trade Controls Compliance regarding public release of any electronic CAD files that can assist in *producing* defense articles controlled under the ITAR.

Please direct any questions regarding this case to Mr. Donald Kluzik at 703-614-4931, email: donald.e.kluzik.civ@mail.mil.

Sincerely,

for

M. M. Langerman
Chief

Enclosures:
As stated

September 25, 2014
Ref: 14-S-2473

Mr. Cody R. Wilson
Defense Distributed
1101 West 34th Street, #340
Austin, TX 78705

Dear Mr. Wilson:

This is in response to the enclosed September 2, 2014, correspondence requesting public release approval of the enclosed documents titled:

- "AR-15 Lower Receiver"

The documents are **APPROVED** for public release. However, this approval does not include any photograph, picture, exhibit, caption, or other supplemental material not specifically approved by this office. Our concurrence for release does not imply DoD endorsement or factual accuracy of the material.

Please direct any questions regarding this case to Mr. Donald Kluzik at 703-614-4931, email: donald.e.kluzik.civ@mail.mil.

Sincerely,

M. M. Langerman
Chief

Enclosures:
As stated

Prepared by: dekluzik:9/25/14:DOPSR:703-614-4931:gr DK pk____

DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF PREPUBLICATION AND SECURITY REVIEW
1155 DEFENSE PENTAGON
WASHINGTON,DC 20301-1155

December 22, 2014
Ref: 15-S-0358
15-S-0514

Mr. Cody R. Wilson
Defense Distributed
1101 West 34th Street, #340
Austin, TX 78705

Dear Mr. Wilson:

This is in response to the letters requesting public release approval of the indicated documents titled:

- "AR-15 Lower Receiver (C)"
- "AR-15 Lower Receiver (M)"

The Defense Office of Prepublication and Security Review (DOPSR) must stay consistent with previous approvals for public release and in compliance with the International Traffic in Arms Regulations (ITAR) 125.4(b)(13) including ITAR 125.4(a) which states this exemption "are also not applicable for purposes of establishing offshore procurement arrangements *or producing defense articles offshore...*"

Therefore, only the **rendered images** requested for review (hard copy or electronic) included within the subject request are **APPROVED** for public release. Public release approval of **the actual electronic CAD files** your request letter states "can be used with a 3D printer or a computer numerical control machine to *produce* the hardware depicted in the rendered images of the electronic files" cannot be approved under ITAR 125.4(b)(13), DOPSR's sole ITAR mention, and **are therefore beyond the purview of DOPSR.**

DOPSR recommends you contact the Department of State, Bureau of Political Military Affairs, Office of Defense Trade Controls Compliance regarding public release of any electronic CAD files that can assist in *producing* defense articles controlled under the ITAR.

Please direct any questions regarding this case to Mr. Donald Kluzik at 703-614-4931, email: donald.e.kluzik.civ@mail.mil.

Sincerely,

for Walt

M. M. Langorman
Chief

Enclosures:
As stated

ATTACHMENT 2

BY COURIER / FEDERAL EXPRESS
Advanced Copy by Email to DDTCResponseTeam@state.gov

January 5, 2015

Ed Peartree, Director
Office of Defense Trade Controls Policy
U.S. Department of State
PM/DDTC, SA-1, 12th Floor
2401 E Street, NW
Washington, D.C. 20037

SUBJECT: Letter authorizing Matthew A. Goldstein, PLLC to submit Advisory Opinion Request on behalf of Defense Distributed

Dear Sir or Madam:

The Law Office of Matthew A. Goldstein, PLLC is authorized to submit an Advisory Opinion request to the Directorate of Defense Trade Controls ("DDTC") on behalf of Defense Distributed, Inc. for advisement on how to obtain prepublication approval from the Office of Defense Trade Controls Compliance ("DDTC Compliance") to transmit privately generated unclassified Computer Assisted Drawing ("CAD") files into the Internet and other public forums; and on what kinds of software, CAD, and other electronic files are reviewable by the Department of Defense Department Office of Prepublication and Security Review for public release.

Defense Distributed authorizes DDTC personnel and other U.S. Government representatives to speak with and to release information pertaining to the request to Mr. Goldstein, who can be reached at:

Matthew A. Goldstein
1012 14th Street, NW, Suite 620
Washington, DC 20005
(202) 550-0040
matthew@goldsteinpllc.com

Thank you in advance for your consideration.

Yours truly,

Cody R. Wilson

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Principal, Defense Distributed, Inc.
1101 W 34th St. #340
Austin, Texas 78705
(501) 743-9680
crw@defcad.com

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ATTACHMENT 3

United States Department of State

Bureau of Political-Military Affairs
Office of Defense Trade Controls Compliance
Washington, D.C. 20522-0112

MAY 08 2013

In reply refer to
[redacted]

Mr. Cody Wilson
Defense Distributed
[redacted]

Dear Mr. Wilson:

The Department of State, Bureau of Political Military Affairs, Office of Defense Trade Controls Compliance, Enforcement Division (DTCC/END) is responsible for compliance with and civil enforcement of the Arms Export Control Act (22 U.S.C. 2778) (AECA) and the AECA's implementing regulations, the International Traffic in Arms Regulations (22 C.F.R. Parts 120-130) (ITAR). The AECA and the ITAR impose certain requirements and restrictions on the transfer of, and access to, controlled defense articles and related technical data designated by the United States Munitions List (USML) (22 C.F.R. Part 121).

DTCC/END is conducting a review of technical data made publicly available by Defense Distributed through its 3D printing website, DEFCAD.org, the majority of which appear to be related to items in Category I of the USML. Defense Distributed may have released ITAR-controlled technical data without the required prior authorization from the Directorate of Defense Trade Controls (DDTC), a violation of the ITAR.

Technical data regulated under the ITAR refers to information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance or modification of defense articles, including information in the form of blueprints, drawings, photographs, plans, instructions or documentation. For a complete definition of technical data, see § 120.10 of the ITAR. Pursuant to § 127.1 of the ITAR,

it is unlawful to export any defense article or technical data for which a license or written approval is required without first obtaining the required authorization from the DDTC. Please note that disclosing (including oral or visual disclosure) or transferring technical data to a foreign person, whether in the United States or abroad, is considered an export under § 120.17 of the ITAR.

The Department believes Defense Distributed may not have established the proper jurisdiction of the subject technical data. To resolve this matter officially, we request that Defense Distributed submit Commodity Jurisdiction (CJ) determination requests for the following selection of data files available on DEFCAD.org, and any other technical data for which Defense Distributed is unable to determine proper jurisdiction:

1. Defense Distributed Liberator pistol
2. .22 electric
3. 125mm BK-14M high-explosive anti-tank warhead
4. 5.56/.223 muzzle brake
5. Springfield XD-40 tactical slide assembly
6. Sound Moderator – slip on
7. "The Dirty Diane" 1/2-28 to 3/4-16 STP S3600 oil filter silencer adapter
8. 12 gauge to .22 CB sub-caliber insert
9. Voltlock electronic black powder system
10. VZ-58 front sight.

DTCC/END requests that Defense Distributed submit its CJ requests within three weeks of receipt of this letter and notify this office of the final CJ determinations. All CJ requests must be submitted electronically through an online application using the DS-4076 Commodity Jurisdiction Request Form. The form, guidance for submitting CJ requests, and other relevant information such as a copy of the ITAR can be found on DDTC's website at http://www.pmddtc.state.gov.

Until the Department provides Defense Distributed with final CJ determinations, Defense Distributed should treat the above technical data as ITAR-controlled. This means that all such data should be removed from public access immediately. Defense Distributed should also review the remainder of the data made public on its website to

determine whether any additional data may be similarly controlled and proceed according to ITAR requirements.

Additionally, DTCC/END requests information about the procedures Defense Distributed follows to determine the classification of its technical data, to include the aforementioned technical data files. We ask that you provide your procedures for determining proper jurisdiction of technical data within 30 days of the date of this letter to Ms. Bridget Van Buren, Compliance Specialist, Enforcement Division, at the address below:

Office of Defense Trade Controls Compliance
[redacted]

We appreciate your full cooperation in this matter. Please note our reference number in any future correspondence.

Sincerely,

Glenn E. Smith
Chief, Enforcement Division

ATTACHMENT 4

BY FEDERAL EXPRESS
ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

September 2, 2014

Department of Defense
Office of Security Review
2A534, Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and advance copy of this letter.

The original of this letter, five (5) CD-ROMs containing the electronic files, and five (5) unbound copies of the rendered images for review, are being sent contemporaneously herewith by Federal Express.

The electronic files are Computer Assisted Drafting ("CAD") files that can be used with a 3D printer or a computer numerical control machine to produce the hardware depicted in the rendered images of the electronic files.

These documents were created by John Sullivan, who is an employee of Defense Distributed. Defense Distributed is a Texas corporation. It is registered with the Department of State as a Defense Article Manufacturer under registration number M-34702.

The information contained in the documents is NOT company proprietary, was NOT developed under any U.S. Government contract, and is NOT subject to any government contract restrictions on dissemination.

These documents are NOT in the public domain. However, public release of the information contained in documents will not harm national security because design

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specifications containing similar information and similar CAD files for AR-15 lower receivers are already publicly available online.

.STP and/or .STL files for AR-15 lower receivers are already publicly available for download at a variety of web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

Other CAD file formats for lower receivers to the AR-15 are also publicly available online at web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
www.cncguns.com/downloads.html

In addition, detailed design specifications for AR-15 lower receivers are also available online from a variety of sources, to include the following:

www.homegunsmith.com/archive/T6215.html
www.ar15.com/archive/topic.html?b=3&f=4&t=619878
www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

I expect to publish the documents on the Defense Distributed website on or about October 1, 2014. OSR review of the documents is therefore needed before September 30, 2014, but review after this time is acceptable in lieu of return without action.

Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

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Att./Encl.:

.IPT Electronic File for AR-15 Lower Receiver (CD-ROM)
.STEP Electronic File for AR-15 Lower Receiver (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (CD-ROM)
5 Rendered Images of .STEP and .STL files

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ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

October 9, 2014

Department of Defense
Office of Security Review
2A534, Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents (M)

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and this advance copy letter.

The original of this letter, five (5) CD-ROMs containing the electronic files, and five (5) unbound copies of the rendered images for review, are being sent contemporaneously herewith by Federal Express.

The electronic files are Computer Assisted Drafting ("CAD") files that can be used with a 3D printer or a computer numerical control machine to produce the hardware depicted in the rendered images of the electronic files.

These documents were created by John Sullivan, who is an employee of Defense Distributed. Defense Distributed is a Texas corporation. It is registered with the Department of State as a Defense Article Manufacturer under registration number M-34702.

The information contained in the documents is NOT company proprietary, was NOT developed under any U.S. Government contract, and is NOT subject to any government contract restrictions on dissemination.

These documents are NOT in the public domain. However, public release of the information contained in documents will not harm national security because design

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specifications containing similar information and similar CAD files for AR-15 lower receivers are already publicly available online.

.STP and/or .STL files for AR-15 lower receivers are already publicly available for download at a variety of web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

Other CAD file formats for lower receivers to the AR-15 are also publicly available online at web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
www.cncguns.com/downloads.html

In addition, detailed design specifications for AR-15 lower receivers are also available online from a variety of sources, to include the following:

www.homegunsmith.com/archive/T6215.html
www.ar15.com/archive/topic.html?b=3&f=4&t=619878
www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

I expect to publish the documents on the Defense Distributed website on or about October 1, 2014. OSR review of the documents is therefore needed before November 3, 2014, but review after this time is acceptable in lieu of return without action.

Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

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Att./Encl.:

.STP Electronic File for AR-15 Lower Receiver (Metal) (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (Metal) (CD-ROM)
5 Rendered Images of .STP and .STL files

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ADVANCE COPY BY ELECTRONIC MAIL
(whs.pentagon.esd.mbx.secrev@mail.mil)

October 9, 2014

Department of Defense
Office of Security Review
2A534, Pentagon
Washington DC 20301-1155

Subject: Request for OSR Review of AR-15 Lower Receiver Documents (C)

Dear Department Representative:

This is a request for review under ITAR Section 125.4(b)(13) and DoDD 5230.29.

Accompanying this letter please find the documents for review. They consist of two (2) electronic files (.STP, and .STL formats) for a lower receiver to the AR-15 rifle and five (5) rendered images of the electronic files. These documents are also attached to the email transmitting and this advance copy letter.

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These documents were created by John Sullivan, who is an employee of Defense Distributed. Defense Distributed is a Texas corporation. It is registered with the Department of State as a Defense Article Manufacturer under registration number M-34702.

The information contained in the documents is NOT company proprietary, was NOT developed under any U.S. Government contract, and is NOT subject to any government contract restrictions on dissemination.

These documents are NOT in the public domain. However, public release of the information contained in documents will not harm national security because design

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specifications containing similar information and similar CAD files for AR-15 lower receivers are already publicly available online.

.STP and/or .STL files for AR-15 lower receivers are already publicly available for download at a variety of web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
http://grabcad.com/library/ar-15-lower-receiver
http://grabcad.com/library/a-printable-ar15-lower-receiver
https://grabcad.com/library/ar15-lower-concept-1
http://grabcad.com/library/ar-15-lower-receiver

Other CAD file formats for lower receivers to the AR-15 are also publicly available online at web addresses, to include the following:

www.3dcadbrowser.com/download.aspx?3dmodel=42013
www.cncguns.com/downloads.html

In addition, detailed design specifications for AR-15 lower receivers are also available online from a variety of sources, to include the following:

www.homegunsmith.com/archive/T6215.html
www.ar15.com/archive/topic.html?b=3&f=4&t=619878
www.advancedrifles.com/build-it-yourself
www.biggerhammer.net/ar15/cad/

I expect to publish the documents on the Defense Distributed website on or about October 1, 2014. OSR review of the documents is therefore needed before November 3, 2014, but review after this time is acceptable in lieu of return without action.

Response by email to me at crw@defdist.org is preferred. If mailing the response, the address for mailing is: 1101 West 34th St., #340, Austin, Texas 78705.

Thank you for your consideration in the matter. I can be reached at (501) 743-9680 with any questions, comments or concerns.

Sincerely,

Cody R. Wilson
Director
Defense Distributed, Inc.

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Att./Encl.:

.STP Electronic File for AR-15 Lower Receiver (Collapsible Stock) (CD-ROM)
.STL Electronic File for AR-15 Lower Receiver (Collapsible Stock) (CD-ROM)
5 Rendered Images of .STP and .STL files

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